



The requested extension of time until November 16, 2020 to submit a reply in support of the Motion to Compel is GRANTED.

The parties are ORDERED to meet and confer by close of business on **November 13, 2020** regarding the snapshot data specifications.

SO ORDERED

11/12/2020

November 10, 2020

VIA ECF

The Honorable Sarah L. Cave, U.S.M.J.
United States District Court, Southern District of New York
500 Pearl Street, Room 702
New York, NY 10007

SARAH L. CAVE
United States Magistrate Judge

Re: Local 3621, et al v. City of New York, et al; Index No. 18-cv-04476 (LJL)(SLC)

Your Honor:

We write to ask for the Court's assistance with regards to the pending motion to compel filed on October 5, 2020 [Doc. No. 192].

In specific, as Your Honor will recall, Defendants are scheduled to produce by November 15, 2020 annual snapshots for each year from 2012 to present with data points pursuant to the Court's specifications as directed in the October 27, 2020 conference conducted telephonically. Your Honor also directed in the November 2, 2020 conference that parties should meet and confer in hopes that some or all of the outstanding items in our motion to compel could be resolved without the need to submit a reply.

However, notwithstanding repeated efforts, Defendants have refused to meet and confer. Most pressing is that parties must ensure an agreed upon format for production of the data which will allow Plaintiffs' expert to use this data. Attached here as **Exhibit A** please find Plaintiffs' numerous efforts to do so, all of which have gone unanswered.

In order to avoid past problems with discovery production, we ask that the Court order parties to meet and confer no later than Friday November 13, 2020 to agree upon a format for these snapshots to be produced in and to see what if any other issues can be resolved related to the pending motion.

85 BROAD STREET
28th FLOOR
NEW YORK, NY 10004

P: 212 253 6911
F: 212 614 2532

kurland@kurlandgroup.com
KURLANDGROUP.COM

To that end, we ask that our deadline to reply to our motion to compel, currently due tomorrow, November 11, 2020, be extended to Monday, November 16, 2020 in hopes that some or all of the relief sought in the motion will be mooted through the production Defendants will make on November 15, 2020.

Respectfully Submitted,

Yetta G. Kurland